

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

R.M.B., by his next friends and parents,)	
Robert Bruce Bays and Linda Markham Bays,)	
and)	
ROBERT BRUCE BAYS)	
and)	
LINDA MARKHAM BAYS,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 6:15cv4
)	
BRIAN WILSON,)	
DR. FREDERICK M. DUIS, JR.,)	
and)	
M. M. CALOHAN,)	
)	
Defendants.)	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Brian Wilson, Dr. Frederick M. Duis, Jr., and M. M. Calohan, by counsel, move pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment and in support thereof states as follows:

1. Defendants are protected from liability by the doctrine of qualified immunity.
2. There are no genuine issues of material fact that preclude entry of summary judgment.

WHEREFORE, Defendants respectfully move the Court for entry of summary judgment in their favor and for such other relief as the Court may deem appropriate.

BRIAN WILSON,
DR. FREDERICK M. DUIS, JR., and
M. M. CALOHAN

By /s/ Jim H. Guynn, Jr.
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CERTIFICATE OF SERVICE

I do hereby certify that on this 4th day of January, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Melvin E. Williams, Esq.
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Counsel for Plaintiff

By /s/ Jim H. Guynn, Jr.